

*Law Office of
Francisco E. Celedonio, Esq.
401 Broadway, 25th Flr.
New York, New York 10013*

MEMO ENDORSED

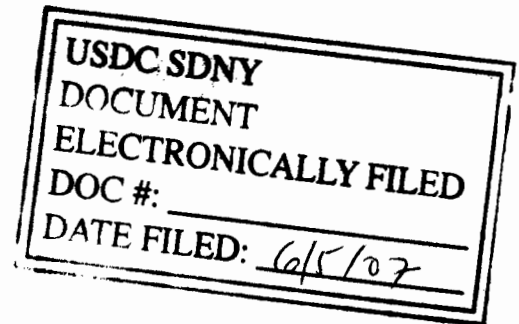
(212) 219-7533

Fax (212) 219-4094

June 1, 2007

VIA FACSIMILE

Honorable Kenneth M. Karas
United States District Judge
United States District Court
Southern District of New York
New York, New York 10007



Re: *United States v. Hassan Osman*,
06 Cr. 1192 (KMK)

Dear Judge Karas:

At our last conference Your Honor established a motion schedule for the above-referenced case. The schedule calls for defense motions to be submitted on or before June 4, 2007, the government's response by July 16th, and defense reply by July 30th.

While I have been engaged in the process of investigating factual support for possible defense motions, the parties have been engaged in a continuing dialogue. We have reached the point where the government is considering a defense proposal that will dispose of this matter through a plea. It occurs to us, however, that it is counterproductive for the parties to engage in motion practice while the process of a disposition is still viable – particularly since AUSA Stein is scheduled to commence a trial before the Honorable Denise L. Cote on Monday June 4, 2007.

Thus, after consulting with AUSA Daniel Stein, the parties jointly request the Court stay the filing of any motions to allow the parties to exhaust the possibility of a disposition.

I respectfully suggest the parties contact the Court no later than July 16, 2007 with a progress report as to the possibility of a disposition. In the event a disposition is not feasible, I will be prepared to file motions expeditiously. Of course, the defense consents to the exclusion of any speedy trial time occasioned by this request that has not already been excluded by the Court.

I appreciate the Court's consideration of the issue presented herein.

Respectfully Submitted,



Francisco E. Celedonio, Esq.

cc: AUSA Daniel Stein

The Court will hold a conference
on June 19, 2007, at 11:30 AM¹ to discuss the status
of this case. Time is excluded until then in
the interests of justice, See 18 U.S.C. § 3161(c)(8)(A),
for the reasons discussed in this letter.

SO ORDERED


KENNETH M. KARAS U.S.D.J.

6/4/07